Developing an Audit Trail

Introduction

Ensuring elections are administered fairly, accurately, transparently, and efficiently requires creating documentation of each component involved in the development and conduct of an election. These components include all pre-election, Election Day, and post-election activities; examples include, but are not limited to, candidate filing forms, voter registration lists, verification of voting systems, poll workers, etc. Documentation of these processes may also serve to prove the accuracy and validity of an election in a court of law and resolve questions regarding the integrity of the election.

Furthermore, developing a formal record (audit trail) of an election's components is an essential tool for election administrators to accurately evaluate the strengths and weaknesses of the processes established to conduct an election. It is therefore important to establish accurate methods and procedures for documenting and reviewing an election's audit trail. This chapter focuses on the documentation of election supplies, documents, and procedures. Audits of election results are discussed in a separate chapter.

In the business of election administration, there is no such thing as too much documentation. From job descriptions and written procedures, to workflow diagrams and charts, to timelines and checklists, the documentation that supports the conduct of an election can resolve questions regarding separation of duties, two person (opposite parties) integrity and chain of custody. It can also prove the accuracy of an election in a court of law.

By routinely collecting detailed documentation of each process, election officials are developing standards for achieving excellence in the management of elections. The collection of documentation (audit trail) is ongoing within election offices nationwide.

> *Example:* Each voter record has its own unique audit trail. From the moment a citizen registers to vote in a jurisdiction, a record or file is created. Think of each voter's record as a legal file folder which contains the history of that voter – when they registered to vote; when they changed their address and/or their party affiliation; whether they voted absentee or early, in-person or by mail and at which location; their voter history and if they voted a provisional ballot, whether that ballot was counted or not; whether they have run for office; whether they were elected to office and for what position, whether they have served as a poll worker and if so, at which polling place and in what position, etc. All of this information and more is contained in each voter's record (audit trail). Therefore, the voter record audit trail is an important tool for determining a voter's eligibility to vote, and provides documentation for processing and qualifying provisional ballots.

The above example is just one of many processes within an election office that requires the development, maintenance and archiving of documentation (audit trail).

Types of Documentation

By reviewing and analyzing all paperwork mailed in, delivered at the front counter, generated by staff, processed by poll workers, and collected from outside sources, i.e. Secretary of State office, county and city agencies, vendors, etc., election officials can start the process of determining the retention cycle for election-related documentation.

This documentation, i.e. records/audit trail, represents the records of the business of elections. Whether each record or document is of short-term, long-term, or archival value, it contains useful and sometimes essential information. Think of each document managed in your office as your office's official documentation – it can contain legally binding decisions, ranging from contracts, purchase agreements, to voted paper ballots. Consideration must also be given to storage requirements and methods for retaining documents. Space issues are dependent upon whether the documentation is stored electronically or on paper.

These records also reflect the memory of your office – how many voters were registered ten years ago compared to today; what type of voting system was used then and now; what was the cost of managing elections then compared to now? Records in an election office document a citizen's most important right – their right to vote.

Government agencies also have a responsibility to comply with open records rules and regulations. Documents involved in the election administration audit trail may be subject to state and/or local Open Records Request or Freedom of Information laws. It is through the availability of information that the general public can develop an understanding of the administration of elections, and perhaps become more involved in the democratic process.

Documentation, records (audit trails) can be categorized as follows:

- Nonessential/inactive records – documents that are routine and would be discarded within a designated period of time. Examples would include routine correspondence and memorandums, etc.

- Active records – those that are mandated by federal and /or state law to be retained for a specific period of time. Examples would include signed contracts, voted ballots, candidate filing forms, etc.

- Archival records – documents that are stored on a permanent basis. Examples include voting district maps, voter registration records, etc.

Each of the above categories is regulated by local, state and federal records retention laws. Election officials are encouraged to verify these retention requirements prior to developing your office records retention policies and procedures.

Examples of types of documentation managed within an election office include, but are not limited to:

- Candidate filing forms
- District and precinct boundary maps
- Voter registration applications
- Absentee ballot applications
- Publications and legal notices
- Equipment inventory and acceptance testing forms
- Ballots
- Logic and accuracy testing documentation
- Equipment and supply checklists
- Poll worker training matreials
- Poll worker assignment forms and oath of office
- Employee timesheets and payroll documentation
- Election Day opening and closing certifications
- Post-election reconciliation forms

Pre-Election Audit Trail

The beginning of a new election cycle is a unique opportunity to catalog the types of documents that are generated from beginning to end. Begin by assigning a core group of full time staff the task of developing a master checklist containing every document that is collected, generated, or created during the pre-election/set up of an election. If such a checklist already exists, continue to evaluate and re-evaluate the items on the checklist and add new documents as needed.

An added benefit is that you are empowering a team of employees to develop a thorough understanding of all components involved in managing an election. The end result is a cross-trained team of employees, who are collecting the internal documentation, which also becomes the checklist and/or timeline for managing elections in your office. When completed, your office will have developed a checklist of permanent and archival election records required for each election. As these documents/records are approved and authorized, they can be stored in consecutive order for storage. Should the need arise, your office will be prepared and ready to provide all legal documents, should they be requested.

Before you begin – remember – there is no such thing as too much documentation!!

Each election begins with a specific number of races and/or questions. The first deadline is the filing deadline. This date becomes the first date on your timeline and also represents the beginning of documentation that creates the election.

Before the election can be set up in your election management and/or voter registration software, you must reaffirm and validate that all precincts and districts are correct and that addresses are correctly assigned to their unique districts/precincts. It is important to understand the overall management of your voter registration software, i.e. who has authority to update precincts and districts and who manages updating the address file within the software. Confirm with your database administrator how user rights are assigned and develop a general understanding about

which fields in your voter registration software are "locked" and require "administrative rights" for managing the data. Ask questions such as:

- When are new addresses added to the system? Are they added when a new subdivision is platted or after the new home building occupancy permit has been issued? If addresses are added before the building is constructed, there is an opportunity for a voter to be added to an address that is actually an empty lot.

- Does your address file contain only residential addresses? Do you have addresses that are post office repositories flagged in your system? Based on your state law, confirm that voters are assigned to residential addresses only.

- Are certain precincts in your jurisdiction split by local school or special district boundaries? Remember that these "split precincts" can cause voter confusion on Election Day. Neighbors in the same precinct could be voting on different school races and/or questions if the precinct is split by school boundaries.

If possible, print a listing of precincts and associated districts prior to the set up of each election. A team of two staff members should proof this listing, using district maps for comparison purposes. If your office maintains GIS mapping software, merge the precincts/districts maintained in your voter registration software with the GIS mapping software to visually verify that all precincts are assigned to the correct districts. By utilizing a map point assigned to each residential address, you have the ability to visually verify that every residential address within your voter registration software is assigned to the correct precinct. In summary:

- Confirm that addresses are assigned to the correct precinct and/or split precinct, then

- Confirm that the precincts are assigned to the correct districts; and finally

- Confirm that the correct districts are set up correctly for each election.

The next components of the pre-election audit trail are the candidate filing forms and/or questions submitted for the ballot. Based on state law, the candidate filing forms for each race must meet certain requirements to qualify for placement on the ballot. Therefore, each form becomes a part of the records for each election. The candidate filing forms and any questions certified for the ballot are the official documents that are used to set up the election. The original filing forms are also the documents that all data entry is proofed back to. Make a listing of all documents that are generated from the original candidate and question filing forms. This listing may include:

- Election set up/ballot generation software candidate report
- Legal candidate publications
- Candidate listing for public distribution
- Web site candidate information

Each document, if created by a different staff person or different software, must be handled and proofed back to the original filing forms. This proofing documentation audit trail for each election should be initialed by two staff members. The proofing team must be staff members who were not involved in creating the initial documents or doing the data entry.

Once the addresses, precincts, and districts have been verified and proofed; the candidate and question filing forms have been processed and all associated documentation and data entry has been proofed; the next step is the development of unique ballot styles.

NOTE: Refer to state law for specific ballot requirements, i.e. rotation of candidate names, partisan and /or straight party ballots, etc.

After the initial ballot styles have been generated, they should be proofed back to the precinct/district printout and the original candidate/question filing forms. A team of staff members not involved in the data entry of the election/ballot generation software proofs and signs off on the official ballot file. The proofed ballot deck becomes a part of the pre-election audit trail.

Once the ballot proofs are returned from the printer, they are once again re-proofed back to the official proofed ballot deck which is already a component of the audit trail.

IMPORTANT: At each point of the proofing and archiving of the pre-election audit trail, it is imperative that ballot generation and voter registration software be backed up and stored off-site. Each of these steps marks a "lock down" point in the preparation of an election.

Once ballots are received from the printer, staff must verify and confirm that the requested number of each ballot style has been received. Again, this document becomes a part of the audit trail, and becomes the control for managing distribution of the printed ballot stock.

Depending upon the type of voting system used, the tabulation software must generate memory cartridges for use in optical scan or voting machines. Logic and accuracy testing is performed to confirm the accuracy of the election setup. All checklists and printouts relating to the logic and accuracy testing are key components of the pre-election audit trail. Examples of the logic and accuracy trail include:

- Opening L&A zero proofs from all voting equipment and optical scanners
- Logic and accuracy marked ballot decks and associated documentation
- Checklists generated for each piece of voting equipment
- Closing L&A total proofs form all equipment and scanners
- Final L&A results report

All of the above documentation should be proofed and initialed by at least two staff persons, or others as required by State law, and stored as part of the pre-election logic and accuracy audit trail.

Absentee and Early Voting Audit Trail

Based on state law, early voting jurisdictions must be prepared to process voters prior to Election Day. In some instances, voters are allowed to vote either in-person or by mail; and in other jurisdictions, voters are only allowed to vote early based on special requirements/circumstances, i.e. disabled and/or out of the jurisdiction on Election Day.

Regardless of the state and local laws and requirements, early voting documentation becomes another component of the audit trail for each election.

Early voting/absentee voting by mail usually begins with an application form, completed by the voter. Based on state law, these forms must be submitted within the designated time frame. Each form should be date stamped for processing. Again, based on state law, there may be requirements on when the ballot must be sent after the application is received in your office. There may be other requirements regarding how the application for the ballot may be received by your office, and who may turn in the application for a ballot. All of these unique laws set the stage for internal policies and procedures for managing the documentation (application forms). These forms, in turn, become a part of the official audit trail for each election.

The requests for absentee ballots must be data entered and are used to validate the voter's right to receive a ballot. The voter registration software is the key control for managing the voter's eligibility to receive and/or request an absentee ballot. Once issued, the voter registration software becomes the control for managing that voter's ability to only vote once in that election.

One example that must be monitored as a part of the audit trail is a voter's request for a replacement ballot. Questions to ask your database administrator include:

- If the voter has already been issued a ballot for that election, how does your software control the issuance of replacement ballots?

- Which ballot can be counted when it is returned? What happens if the original ballot is returned and the replacement ballot? Which ballot is counted?

- How are user rights restricted for issuance of absentee ballots? Is the data field "locked down"? If a user has a data entry error, how is the error corrected?

These questions are important because each cycle of ballot requests processed will generate a subsequent set of printed ballot envelopes and/or labels. Each of these print "jobs" should be balanced back to the number of absentee application data entered to verify that ballots requested equals ballot envelopes printed. *Tip: Consider printing an alphabetical listing of applications processed to be a part of your audit trail.*

If ballot envelopes are stuffed by hand, a team of two people should verify that the correct ballot style has been inserted in each envelope. The envelopes should be processed in groups, representing a print "job" that has already been balanced to the number of applications data entered.

After each group of ballot envelopes has been sealed, the total number should once again be confirmed and balanced back to the initial number proofed from the initial print "job."

Applications Processed = Envelopes/Labels Printed = Envelopes Stuffed and Sealed = Total Envelopes Delivered to the Post Office on Each Day.

The daily log of print jobs, initialed by different staff members, represents another key component of the absentee and early voting audit trail.

The returned ballot audit trail should be managed in the same fashion as the outgoing ballot audit trail. *Tip: Train your staff to think of each returned ballot envelope as a dollar bill – they must be counted individually, sorted, bundled, and balanced at the end of each day.*

Again, the voter registration software contains the history of all returned ballot envelopes. Once the voter's record has indicated a ballot has been returned, that voter cannot vote again in that election. It is critical to understand user rights to the software and to confirm that the voter history data fields are in fact "locked down". Any need to correct a user's mistake in recording voter history must be documented and signed off by at least two administrative staff members.

All ballot envelopes returned must be stored in a secure, controlled environment with restricted access. Log sheets, computer or hand generated, must be created and updated on a daily basis. Returned ballot envelopes should be bundled in batches and recorded on a log sheet. This process assures that all batches have been accounted for and processed at the end of the election.

The final audit trail for absentee and early voting should support and validate that:

- Total number of ballot envelopes returned = the total voters with voter history recorded

- Total ballot envelopes returned MINUS ballots challenged = ballot envelopes authorized to be opened

- Total ballot envelopes authorized to be opened = total ballots scanned for unofficial results

- PLUS total number of provisional/challenged ballots MINUS total number of provisional/challenged ballots NOT authorized to be counted

- EQUALS total number of all ballots scanned for official results

Each step of the outgoing and incoming absentee/early voting audit trail should be recorded, balanced and initialed by two staff members.

Remember: All "dollar bills" returned must be counted, balanced, and tabulated. The audit logs become the official documentation for each election.

Polling Place Supplies and Equipment Audit Trail

Preparing for voting on Election Day at polling places located throughout your jurisdiction requires paperwork to support and verify that the proper supplies and equipment has been prepared and distributed to the correct polling place location.

Preparation of supplies is done in a variety of ways throughout the country. Generic Election Day supplies are often pre-packaged for distribution to polling places and are often locked, sealed and delivered with equipment prior to Election Day. Other offices may distribute all supplies and equipment to supervisory poll workers whose job includes verifying the supplies and bringing them to the polling place on Election morning. Other offices may deliver some supplies and equipment; and distribute other unique election supplies to the supervisory poll workers on the day prior to Election Day.

Regardless of the distribution method, packaging of supplies is a critical component for success on Election Day. Imagine an Election Day where different supplies are missing from different supply bags at polling places all over your jurisdiction. From managing the phone calls from frustrated poll workers…to dispatching missing supplies to polling places all over the county, a routine election can quickly turn into a disaster.

Each polling place supply kit/bag should be packaged according to a supply checklist. Each bag and checklist should be numbered. The contents of the bag should be itemized and proofed and the checklist signed off by two staff members. Mission critical supplies, i.e. paper ballots and voter registration lists, should be proofed by key administrative staff. Each of these supply bag checklists becomes part of the election audit trail. *NOTE: If you receive calls reporting missing supplies, you can quickly refer to the supply checklists to determine who was responsible for packaging that supply bag.*

Voting equipment checklists and delivery sheets, including the serial number for each machine, protective counter numbers, and any tamper-evident seals and/or tamper resistant tape numbers should be recorded and confirmed by staff, by delivery staff, and again by the poll workers on Election morning.

On Election morning, protective and public counter numbers of all equipment should be verified by poll workers. The opening zero tape printout should be signed by poll workers. All of these documents begin to build the audit trail for each polling place on Election Day.

Field technicians/rovers can serve as additional verifiers on Election Day. By completing a polling place operational checklist, the rover and supervisory poll workers can both sign and confirm that each polling place has been set up according to diagram layouts and operational procedures.

Throughout the day, poll workers can complete verification reports to confirm that the number of voters checked in equals the number of ballots issued and the number of ballots scanned or recorded on public counters on all voting equipment.

When the polls close, closing verification forms are completed by poll workers, documenting the protective and public counter numbers on all voting equipment, and all tamper-evident seals and tape securing the equipment. The end of day result tapes are printed from each voting machine and signed by poll workers. These total votes collected from all voting machines should balance to the number of total voters processed at each polling place.

Post-Election Audit

Once all ballots have been scanned and all voting machine cartridges have been returned and unofficial results reported, your office should secure all supplies and documentation from each polling place.

NOTE: A post election audit can be accomplished in many different ways, and is often required based on specific state law. A separate Election Management chapter has been developed to discuss recounts and random auditing of election results. This chapter will address auditing of supplies, documents, and procedures.

The purpose of conducting a post-election audit of supplies and documentation is two fold:

- First, you want to ensure that all supplies have been accounted for and returned from each polling place. *TIP: Bar code technology provides simply inventory control for equipment and mission-critical supplies.*

- Second, you need to audit the work completed by the poll workers to verify that all paperwork has been completed correctly. *TIP: Consider providing an incentive program to encourage poll workers to return all supplies and properly complete all paperwork.*

If possible, consider utilizing other county staff members to assist your office in accomplishing the post-election audit. Assign the staff to work in teams of two, with each team assigned a separate work area and table. A checklist of all supplies to be accounted for should be prepared for each polling place supply bag/kit. (Examples of checklists are included at the end of this chapter.) In order to streamline the audit, develop the teams to work in an assembly-line fashion. An example of the way to organize the teams is as follows:

- The first team uses a checklist to locate specific supplies, and hands them to the second team. Team one continues to process all remaining supplies.

- Team two locates any provisional ballots and hands them to team three. Team two continues to utilize their checklist and verify that all forms are accounted for and completed correctly.

- Team three counts all provisional ballot envelopes and balances the number to the signature roster for each polling place. The provisional ballot envelopes are then forwarded to a review team for research.

When all forms and supplies have been accounted for, finalize the post-election audit by organizing and filing all documents in the same order for each polling place. These documents should be stored, sealed and archived according to state law.

ALLEN COUNTY BOARD OF ELECTIONS
ELECTION DATE_____/____/_____PRECINCT_____

SUMMARY SHEET REPORT

CORRECT   COMMENTS

	CORRECT	COMMENTS
BALLOTS RECEIVED		
TOTAL BALLOTS COUNTED		
PROVISIONAL BALLOTS		
17 YR. OLD BALLOTS		
UNPROCESSED BALLOTS		
SOILED BALLOTS		
BALLOTS ISSUED		
LINE 1-5 MATH		
BALLOTS USED FROM PAD		
LINE 6/7 MATCH		
SIGNATURES		

SUMMARY SHEET   EXCELLENT   GOOD   FAIR   CHECKED BY_____

FROM PE-3

ALLEN COUNTY BOARD OF ELECTIONS
ELECTION DATE_____/____/_____PRECINCT_____

POLL BOOK REPORT

	CORRECT	COMMENTS
OATH SIGNED		
CERTIFICATION SIGNED		
SIGNATURE		
ADDRESS		
VOTES CAST		
STUB NUMBERS		
PROVISIONAL		
YELLOW LAST PAGE		
HIGHLIGHTER		
ABSENTEE		
MISC		

POLL BOOK   EXCELLENT   GOOD   FAIR   CHECKED BY_____

FORM PE-3

PRECINCT BOARD PERFORMANCE MATRIX

Election Date: _____   Precinct Number: _____

Points Possible = 36   32 or above = BONUS

	ACTIVITY	YES	NO	POINTS POSSIBLE	POINTS AWARDED
1	Security Log Completed and returned as required			6	
2	Attended School of Instructions – Inspector only required			2	
3	Polls opened and closed timely			2	
4	Results transmitted by 9:00 p.m. or Elections Office notified of problem transmitting (See GEMS Log)			1	
	Roster-Index				
1	Ballot Statement completed			2	
2	Calculations on Ballot Statement are accurate			2	
3	Declaration of Election Officers completed correctly			1	
4	Certificate of Voters Voting completed correctly			1	
5	Absentee voters transferred to roster-index pages			1	
6	Absentee voters signed "AV roster" – not main roster			1	
7	All provisional voters signed "Log of Provisional Voters" and not master Roster			1	
8	Board finds voters on roster or supplemental roster – two or more registered voters voting provisional ballots loses point			1	
	Required materials turned in on election night in transport bag				
1	Ballot receipt completed and returned			1	
2	Regular voted ballots returned in Container A			1	
3	Container A sealed			1	
4	Number of ballots enclosed written correctly on Container A label			1	
5	**Provisional Plastic Bag** – label on paper, not bag, number of provisional ballot envelopes on paper, and Provisional ballot envelopes inside bag			1	
6	**Provisional** envelopes received from voters are completed correctly by board with affidavits as appropriate			1	
7	**Absentee Ballot (AV) Bag** – label on paper, not bag, number of absentee ballot envelopes on paper, and Absentee ballot envelopes inside bag			1	
8	**Write-in Bag (#3)** – label on paper, not bag, outside of envelope completed correctly and Write-in ballots inside envelope			1	
9	**Bag (Envelope) #2** – label on paper, not bag, check boxes completed correctly and Master Roster, Oath/Payroll, AccuVote Results Tape, completed affidavits, certificate, and etc. in envelope			1	
10	**Ballots Not Read by AccuVote Bag** – label on paper, not bag, place all valid ballots the AccuVote could not read in this bag			1	
11	**Bag #1** – label on paper, not bag, containing spoiled ballots, stubs, and surrendered AV ballots – **No valid ballots in bag**			1	
12	**Transport bag locked**			2	
	Miscellaneous				
1	Unused ballots returned in Supply Box			1	
2	Unused ballots accounting sheet completed correctly			1	
	Total Points			36	
	Bonus YES NO				